

# EXHIBIT 13

**From:** Matthew Heimbach <[matthew.w.heimbach@gmail.com](mailto:matthew.w.heimbach@gmail.com)>  
**Sent:** Sunday, July 7, 2019 9:14 PM  
**To:** Michael Bloch <[mbloch@kaplanhecker.com](mailto:mbloch@kaplanhecker.com)>  
**Subject:** Re: Sines v. Kessler

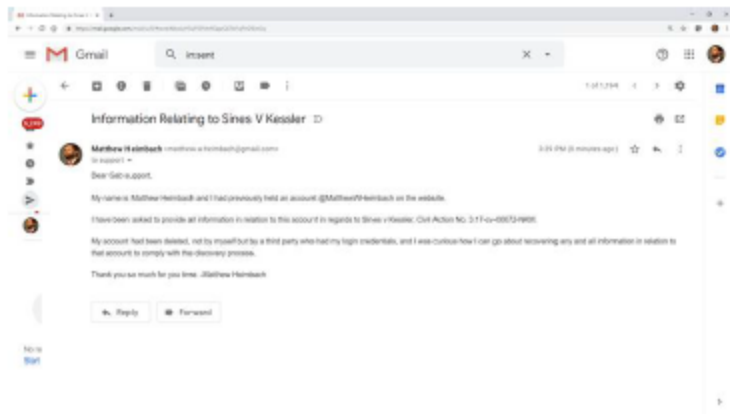
In terms of Section 4 "All Documents and Communications concerning violence, intimidation, or harassment of Persons on the basis of race, religion, or ethnicity, including but not limited to, ethnic cleansing, white genocide, a white ethno-state, or any other form of large or small scale violence." Now, I've always advocated a peaceful solution to problems in America, but to begin providing you with documents I have that may be of interest and complete your requests, I've included them below, including my unfinished manuscript for my book *White Juche*. I've included all copies of Party emails I sent, things relating to organization etc.

The third party vendor of course will get access to all of my Google docs and communications from the Internal Ticket System through Mr. Parrott. Hopefully this is helpful in my attempt to comply with all discovery.

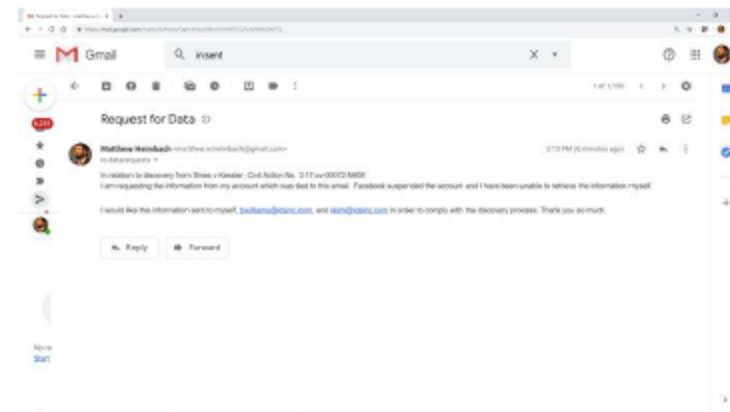
On Sun, Jul 7, 2019 at 3:42 PM Matthew Heimbach <[matthew.w.heimbach@gmail.com](mailto:matthew.w.heimbach@gmail.com)> wrote:

Also, here is a request I have written to Gab tech support in relation to that account. The account had been deleted by a third party who had the login credentials, this third party is willing to also do a signed affidavit to explain that they had deleted the account and the reason why, if that would be necessary for your side and the court, but at the very least I'm attempting to get the information for said account directly from Gab.

Sorry for the deluge of emails.



On Sun, Jul 7, 2019 at 3:19 PM Matthew Heimbach <[matthew.w.heimbach@gmail.com](mailto:matthew.w.heimbach@gmail.com)> wrote:



Here is a screenshot of my request to Facebook Data Requests to begin the process on my end as well. Sorry for the email spam.

Btw I don't know if I missed it, but the initial interrogatories done on my behalf by Mr. Kolenich, I wanted to review them before we proceed on that front.

On Sun, Jul 7, 2019 at 3:16 PM Michael Bloch <[mbloch@kaplanhecker.com](mailto:mbloch@kaplanhecker.com)> wrote:

Thanks very much. And confirmed that we received the other two documents on Friday.

Mike

From: Matthew Heimbach <[matthew.w.heimbach@gmail.com](mailto:matthew.w.heimbach@gmail.com)>  
Sent: Sunday, July 7, 2019 3:07 PM

To: Michael Bloch <[mbloch@kaplanhecker.com](mailto:mbloch@kaplanhecker.com)>  
Subject: Re: Sines v. Kessler

I've sent the proper forms to Discord and Twitter, I'm sending you copies of the signed requests just for record keeping purposes.

On Fri, Jul 5, 2019 at 6:49 PM Matthew Heimbach <[matthew.w.heimbach@gmail.com](mailto:matthew.w.heimbach@gmail.com)> wrote:

Thanks so much, I'll be getting this done over the weekend and we can touch base at the first part of the week for if I'm missing anything.

Also just confirming you got my appeal of sanctions and the affidavit from my ex wife.

Hope you had a happy 4th of July.

On Fri, Jul 5, 2019, 18:34 Michael Bloch <[mbloch@kaplanhecker.com](mailto:mbloch@kaplanhecker.com)> wrote:

Matt,

In response to your question the other day regarding the Twitter form, when you complete the form you should email it to [tw-legal@twitter.com](mailto:tw-legal@twitter.com).

Additionally, the Requests for Production and Interrogatories we discussed are attached to my July 1 email. I have re-attached them here for your convenience.

Thanks,

Mike

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From: Michael Bloch  
Sent: Monday, July 1, 2019 8:36 PM

To: [matthew.w.heimbach@gmail.com](mailto:matthew.w.heimbach@gmail.com)  
Cc: Gabrielle E. Tenzer <[gtenzer@kaplanhecker.com](mailto:gtenzer@kaplanhecker.com)>  
Subject: Sines v. Kessler

Mr. Heimbach:

We are writing to provide information and materials to help you comply with the Court's June 21 Order concerning the pending motion for sanctions against you. The June 21 Order references its previous orders that detail your obligations in discovery. Those orders are attached here for your convenience. (ECF Nos. 287, 379, 383, 440, and ECF No. 282, at 23-24.)

Regarding your discovery obligations, the June 21 Order requires, among other things, the following:

- Provide complete and accurate written answers or responses to Plaintiffs' First Set of Interrogatories and Requests for Production of Documents, as required by the Court's Order of March 26, 2108, ECF No. 224. Plaintiffs' First Set of Interrogatories and Requests for Production of Documents are attached.
- Give Plaintiffs' counsel a complete and accurate Stored Communications Act ("SCA") consent form allowing Discord to produce any discoverable documents or electronically stored information ("ESI") in response to Plaintiffs' subpoenas, as required by the Court's Order of November 13, 2018, ECF No. 379. A copy of the SCA consent that you must fill out is attached. Once you fill out the document, you must e-mail it from the e-mail address that is associated with the Discord account to [sca@bsfillp.com](mailto:sca@bsfillp.com). If you had or have more than one Discord account that contained potentially relevant documents, you must fill out a consent form for each account.
- Complete consent forms giving Plaintiffs' counsel access to any other social media accounts (e.g., Facebook, Twitter, Gab) that you used to communicate about the Events at issue in this lawsuit, regardless of whether those accounts have been disabled, suspended, or deleted. We have attached to this email an authorization form from Twitter that will allow data to be recovered from suspended or disabled accounts and sent to a third-party vendor for imaging.
  - Please complete the attached consent form. Once the form is complete, please submit a request through the privacy form at <https://help.twitter.com/forms/privacy>. In the

section of the form entitled, "Please enter the specific information you are requesting:", you must do two things:

(a) specify what content and data you are requesting (which should be identical to the data requested in the consent form). Specifically, the data you should request is as follows: Profile Data, Followers, Following, Tweets (and retweets), Replies, Notifications, Messages (Direct Messages or "DMs"), Any other items we would expect to find if we were viewing your live twitter account with full access and control.

(b) list the discovery vendor's email address as the email address where the content and data should be sent ([bwilliams@idsinc.com](mailto:bwilliams@idsinc.com) and [kkim@idsinc.com](mailto:kkim@idsinc.com)). (Note that in the section entitled, "The email address associated with your Twitter account", the account-holder must enter the email address associated with their suspended Twitter account -- not the discovery vendor's email address.)

- It is important that the consent form is submitted via email before the privacy form request is submitted. After Twitter receives and validates both the paper consent form and the privacy form request, Twitter will email any requested and reasonably available content and data to the third-party discovery vendor.
- Comply immediately with each of the following provisions in the Stipulation and Order for the Imaging, Preservation and Production of Documents, ECF No. 383 ("Imaging Order"), as required by the Court's Orders of November 19, 2018, ECF No. 383 and March 4, 2019, ECF No. 440:
  - Execute the Third-Party Discovery Vendor contract. That contract will be sent to you by the third-party vendor via e-mail.
  - Complete and provide to Plaintiffs' counsel the Certification Form attached as Exhibit A to the Imaging Order, ECF No. 383, at 16. That document is attached.
  - Make available to the Third-Party Discovery Vendor for imaging and collection any Electronic Devices or Social Media Account identified in the Defendant's Certification Form. For any questions, contact Ken Kim at [kkim@idsinc.com](mailto:kkim@idsinc.com).

If we can further assist in your compliance with the Court's orders regarding your discovery obligations, feel free to contact me at this address.

**Michael Bloch | Kaplan Hecker & Fink LLP**  
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